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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 NEXTDOOR.COM, INC., a Delaware  
12 corporation,

13 Plaintiff,

14 vs.

15 RAJ ABHYANKER, an individual,

16 Defendant.

Case No. 3:12-cv-05667-EMC

**DECLARATION OF RAJ ABHYANKER  
IN RESPONSE TO DISCOVERY ORDER  
(DKT. 353)**

1 I, Raj Abhyanker, declare as follows:

2 1. I am the defendant in this lawsuit. The matters set forth herein are of my own  
3 personal knowledge, or rely upon assurances, as is my custom when completing taxes, provided  
4 by my tax preparer. If called upon to testify as to such matters, I could and would do so. I file  
5 this declaration publicly, though any tax content generally referred to herein should be maintained  
6 as highly confidential in keeping with the protective order on file in this case.

7 2. As explained to me by my tax preparer, the amended joint 2008 tax return filed  
8 with the Internal Revenue Service made no changes as to losses or deductions taken for  
9 LegalForce.

10 3. As explained to me by my tax preparer, the 2007 and 2009 joint tax return copies  
11 provided for discovery in this case contained the same tax content as those given to me and/or to  
12 my wife by our tax preparer from the office of Jerry Moorman to mail to the Internal Revenue  
13 Service.

14 4. My 2007 and 2009 joint tax returns were signed by my tax preparer, my wife and  
15 myself prior to being mailed to the Internal Revenue Service.

16 5. I declare under penalty of perjury under the laws of the State of California that the  
17 foregoing is true and correct.

18 Executed this 15 of October, 2014 at Mountain View, California.

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20  
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22 \_\_\_\_\_  
Raj Abhyanker